

August 06, 2024

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
LAREDO DIVISION

Nathan Ochsner, Clerk of Court

UNITED STATES OF AMERICA

v.

TOMAS DON WRIGHT

§  
§  
§  
§  
§CRIMINAL NO. **L- 24-CR-872****INDICTMENT****DS****THE GRAND JURY CHARGES THAT:****COUNT ONE**

On or about **July 17, 2024**, in the Southern District of Texas and within the jurisdiction of the Court, Defendant,

**TOMAS DON WRIGHT,**

knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed at least one of the following firearms:

|          | <u><b>Firearms</b></u> |            |          |                 |               |
|----------|------------------------|------------|----------|-----------------|---------------|
| Item No. | Manufacturer           | Model      | Type     | Caliber         | Serial Number |
| 1.       | Palmetto State Armory  | M4 Carbine | Rifle    | 5.56-millimeter | W1914607      |
| 2.       | Hatfield               | SGL        | Shotgun  | .410 gauge      | 410S20-004496 |
| 3.       | Winchester             | 67-22      | Rifle    | .22             | None          |
| 4.       | Taurus                 | PT840      | Pistol   | .40             | SFS38304      |
| 5.       | Ruger                  | P95        | Pistol   | 9-millimeter    | 306-72936     |
| 6.       | Rossi                  | 461        | Revolver | .357            | DU269529      |

and the firearms were in and affecting commerce.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

**COUNT TWO**

Beginning on or about **June 24, 2024**, through on or about **July 17, 2024**, in the Southern

District of Texas and within the jurisdiction of the Court, Defendant,

**TOMAS DON WRIGHT,**

did knowingly possess a machine gun, that is, at least one privately made component referred to as a metal drop-in auto-sear without a serial number and without an industry marking.

In violation of Title 18, United States Code, Sections 922(o) and 924(a)(2).

**COUNT THREE**

On or about **July 17, 2024**, in the Southern District of Texas and within the jurisdiction of the Court, Defendant,

**TOMAS DON WRIGHT,**

did knowingly possess a machine gun, that is, at least one privately made component referred to as polymer drop-in auto-sear without a serial number and without an industry marking.

In violation of Title 18, United States Code, Sections 922(o) and 924(a)(2).

**COUNT FOUR**

On or about **July 17, 2024**, in the Southern District of Texas and within the jurisdiction of the Court, Defendant,

**TOMAS DON WRIGHT,**

did knowingly possess a machine gun, that is, at least one privately made component referred to as a “Glock Switch” without a serial number and without an industry marking.

In violation of Title 18, United States Code, Sections 922(o) and 924(a)(2).

**COUNT FIVE**

Beginning on or about **June 24, 2024**, through on or about **July 17, 2024**, in the Southern District of Texas and within the jurisdiction of the Court, Defendant,

**TOMAS DON WRIGHT,**

knowingly possessed at least one of the following firearms:

| <b><u>Firearms</u></b> |                                  |                           |                               |
|------------------------|----------------------------------|---------------------------|-------------------------------|
| Item No.               | Manufacturer                     | Description               | Purpose                       |
| 1.                     | Privately Manufactured Component | Polymer drop-in auto-sear | Machine Gun Conversion Device |
| 2.                     | Privately Manufactured Component | Metal drop-in auto-sear   | Machine Gun Conversion Device |
| 3.                     | Privately Manufactured Component | Polymer “Glock switch”    | Machine Gun Conversion Device |

which were made in violation of the National Firearms Registration and Transfer Record.

In violation of Title 26, United States Code, Sections 5822, 5861(c) and 5871.

### **COUNT SIX**

Beginning on or about **June 24, 2024**, through on or about **July 17, 2024**, in the Southern District of Texas and within the jurisdiction of the Court, Defendant,

**TOMAS DON WRIGHT,**

knowingly possessed at least one of the following firearms:

| <b><u>Firearms</u></b> |                                  |                           |                               |
|------------------------|----------------------------------|---------------------------|-------------------------------|
| Item No.               | Manufacturer                     | Type                      | Description                   |
| 1.                     | Privately Manufactured Component | Polymer drop-in auto-sear | Machine Gun Conversion Device |
| 2.                     | Privately Manufactured Component | Metal drop-in auto-sear   | Machine Gun Conversion Device |
| 3.                     | Privately Manufactured Component | Polymer Glock switch      | Machine Gun Conversion Device |

that were not registered to the Defendant in the National Firearms Registration and Transfer Record.

In violation of Title 26, United States Code, Sections 5841, 5861(d), and 5871.

**COUNT SEVEN**

Beginning on or about **June 24, 2024**, through on or about **July 17, 2024**, in the Southern District of Texas and within the jurisdiction of the Court, Defendant,

**TOMAS DON WRIGHT,**

knowingly possessed at least one of the following firearms:

| Item No. | Manufacturer                     | Type                      | Description                   |
|----------|----------------------------------|---------------------------|-------------------------------|
| 1.       | Privately Manufactured Component | Polymer drop-in auto-sear | Machine Gun Conversion Device |
| 2.       | Privately Manufactured Component | Metal drop-in auto-sear   | Machine Gun Conversion Device |
| 3.       | Privately Manufactured Component | Polymer Glock switch      | Machine Gun Conversion Device |

that were not identified by a serial number as required by the National Firearms Registration and Transfer Record.

In violation of Title 26, United States Code, Sections 5861(i), and 5871.

**NOTICE OF FORFEITURE**  
**18 U.S.C. 922(g) and (o)**  
**(Counts 1–4)**

Pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), the United States gives notice to Defendant,

**TOMAS DON WRIGHT,**

that upon conviction of a violation of Title 18, United States Code, Section 922(g) or (o), all firearms involved in said violation are subject to forfeiture, including but not limited to the following:

- 1) thirteen (13) privately made components referred to as metal drop-in auto-sears, without a serial number and industry markings.
- 2) forty-six (46) privately made components referred to as polymer drop-in auto-sears without a serial number and industry markings.
- 3) two (2) privately made components referred to as “Glock Switches” without a serial number and industry markings.
- 4) one (1) Palmetto State Armory, Model: M4 Carbine, serial number W1914607, 5.56-millimeter rifle
- 5) one (1) Hatfield, Model: SGL, .410 gauge shotgun, serial number 410S20-004496
- 6) one (1) Winchester, Model: 67-22, .22 caliber rifle, no serial number
- 7) one (1) Ruger, Model: P95, 9-millimeter pistol, serial number 306-72936
- 8) one (1) Rossi, Model: 461, .357 caliber pistol, serial number DU269529
- 9) one (1) Taurus, Model: PT840, .40 caliber pistol, serial number SFS38304

**NOTICE OF FORFEITURE**  
**26 U.S.C. §§ 5861(c)–(d),(i)**  
**(Counts 5–7)**

Pursuant to Title 26, United States Code, Section 5872 and Title 28, United States Code, Section 2461(c), the United States gives notice to Defendant,

**TOMAS DON WRIGHT,**

that upon conviction of a violation of Title 26, United States Code, Section 5861(c), (d), or (i), all firearms involved in said violation are subject to forfeiture, including but not limited to the following:

- 1) thirteen (13) privately made components referred to as metal drop-in auto-sears, without a serial number or industry markings.
- 2) forty-six (46) privately made components referred to as polymer drop-in auto-sears without a serial number or industry markings.
- 3) two (2) privately made components referred to as “Glock switches” without a serial number or industry markings.

A TRUE BILL:

ORIGINAL SIGNATURE ON FILE

ALAMDAR S. HAMDANI  
UNITED STATES ATTORNEY



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Christine A. Cortez  
Assistant United States Attorney

USA-74-24b  
(Rev. 6-1-71)

**L- 24-CR-872**

**CRIMINAL DOCKET**

LAREDO DIVISION

NO. **DS**

FILE: 24-04742

MAG#: 24-00902

INDICTMENT

Filed: August 6, 2024

Judge: \_\_\_\_\_

ATTORNEYS:

UNITED STATES OF AMERICA

VS.

ALAMDAR S. HAMDANI, USA  
CHRISTINE A. CORTEZ, AUSA

**TOMAS DON WRIGHT**

**CHARGES:**

- Ct. 1: Possession of Firearm and Ammunition by a person having been convicted of a crime punishable by imprisonment for a term exceeding one year  
[18 USC 922(g)(1), 924(a)(8)]
- Cts. 2–4: Illegal Possession of a Machine Gun  
[18 USC 922(o), 924(a)(2)]
- Ct. 5: Possession of Firearm Made in Violation of the National Firearms Act  
[26 USC 5822, 5861(c), and 5871]
- Ct. 6: Possession of Unregistered Firearm Made in Violation of the National Firearms Act  
[26 USC 5841, 5861(d), and 5871]
- Ct. 7: Possession of Firearm Unidentified by Serial Number Made in Violation of the National Firearms Act  
[26 USC 5861(i), and 5871]

Notice of Forfeiture

**TOTAL COUNTS: 7**

**PENALTY:**

- Ct. 1: 0 to 15 years and/or \$250,000 fine, \$100 special assessment,  
Not more than a three-year term of supervised release
- Cts. 2–7: 0 to 10 Years and/or \$250,000 fine, \$100 special assessment,  
Not more than a three-year term of supervised release